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9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 DAEKUN CHO,
aka "DK,"

16 Defendant.
17

No. MJ 23-1090-DUTY

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER UNSEALING THE COMPLAINT

18 Plaintiff United States of America, by and through its counsel
19 of record, the United States Attorney for the Central District of
20 California and Assistant United States Attorney Jena A. MacCabe,
21 hereby applies ex parte for an order directing that the complaint be
22 unsealed.

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1 This ex parte application is based upon the attached declaration
2 of Jena A. MacCabe.

3 Dated: March 16, 2023

Respectfully submitted,

4 E. MARTIN ESTRADA
5 United States Attorney

6 MACK E. JENKINS
7 Assistant United States Attorney
8 Chief, Criminal Division

9 /s/
10 _____
11 JENA A. MACCABE
12 Assistant United States Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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DECLARATION OF JENA A. MACCABE

I, Jena A. MacCabe, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am the attorney representing the government in this case.

2. On March 16, 2023, defendant DAEKUN CHO, also known as "DK," ("defendant") was arrested pursuant to a criminal complaint and arrest warrant in United States v. Daekun Cho, 23-MJ-1090-DUTY.

3. The government requests unsealing of the complaint. Defendant has been arrested, and therefore, disclosure will no longer jeopardize the investigation or apprehension of the target subject.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on March 16, 2023.

/s/
JENA A. MACCABE